

FILED IN OPEN COURT
ON 12/20/18 NB
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC

INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about March 17, 2018, in the Eastern District of North Carolina, the defendant, DOMINIQUE WILLIAMS, knowingly possessed a stolen firearm, which had been shipped and transported in interstate commerce before it was stolen, knowing and having reasonable cause to believe the firearm was stolen, in violation of Title 18, United States Code, Sections 922(j) and 924.

COUNT TWO

On or about March 17, 2018, in the Eastern District of North Carolina, DOMINIQUE WILLIAMS, the defendant herein, did knowingly and intentionally possess with the intent to distribute a quantity of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

On or about March 17, 2018, in the Eastern District of North Carolina, DOMINIQUE WILLIAMS, the defendant herein, did knowingly possess a firearm in

furtherance of a drug trafficking crime prosecutable in a court of the United States, as alleged in Count Two of this Indictment, in violation of Title 18 United States Code, Sections 924(c)(1)(A)(i).

[Remainder of page intentionally left blank]

FORFEITURE NOTICE

The defendant is given notice that all of the defendant's interest in all property specified herein is subject to forfeiture.

Upon conviction of the offense set forth in Count One, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), as made applicable by Title 28, United States Code, Section 2461(c), any and all firearms or ammunition involved in or used in a knowing commission of the said offense.

The forfeitable property includes, but is not limited to, the following:

- (a) Any and all ammunition seized.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant --

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

REDACTED VERSION

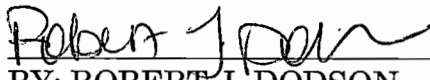
Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE:

12/20/18

ROBERT J. HIGDON, JR.
United States Attorney



BY: ROBERT J. DODSON
Assistant United States Attorney